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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA - SOUTHERN DIVISION

TRENTON SMITH and MICHAEL
BURROW, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

JOHN SHAHIDI, NELK, INC.,
METACARD, LLC, NELK USA, INC.,
and KYLE FORGEARD

Defendants.

Case No. 8:25-cv-161-FWS-DFM

**DECLARATION OF RONA S. LI
IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS FIRST
AMENDED CLASS ACTION
COMPLAINT FOR DAMAGES**

Courtroom: 10D
Judge: Hon. Fred W. Slaughter
Date: September 18, 2025
Time: 10:00 a.m. (PDT)

1 I, Rona S. Li, hereby declare as follows:

2 1. I am an attorney at the law firm of Cooley LLP, counsel for Defendants
3 John Shahidi, Nelk, Inc., Metacard, LLC, Nelk USA, Inc., and Kyle Forgeard
4 (collectively, “Defendants”) in this action. I submit this declaration in support of
5 Defendants’ Motion to Dismiss First Amended Class Action Complaint for Damages
6 (“AC”). I have personal knowledge of the facts set forth in this declaration and if
7 called upon to testify, I could and would testify to such facts.

8 2. On July 2, 2025, I informed Plaintiffs’ counsel that Plaintiff Michael
9 Burrow never returned his Metacard to qualify for a refund, and therefore that the
10 breach of contract allegations in the FAC are demonstrably false. Although Plaintiffs’
11 counsel promised to investigate the matter with Burrow and revert, Defendants’
12 counsel have heard nothing since.

13 3. Attached as **Exhibit 1** is a true and correct copy of the complaint filed
14 by Plaintiffs’ counsel in California state court in the matter of *Husary v. Shahidi*, No.
15 30-2025-01487294-CU-BT-CXC (Cal. Super. Ct. June 2, 2025).

16 4. Attached as **Exhibit 2** is a true and correct copy of the May 20, 2024, X
17 (formerly, Twitter) post from the user account “Full Send Frens NFT” announcing
18 the Metacard rescission offer.

19 5. Attached as **Exhibit 3** is a true and correct copy of the May 20, 2024,
20 Discord post from the user account “Birdmain” announcing the Metacard rescission
21 offer.

22 6. Attached as **Exhibit 4** is a true and correct copy of the portal.metacard.io
23 website announcing the Metacard rescission offer. This webpage is available to the
24 public and can be accessed at <https://portal.metacard.io/>.

1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct. Executed this 10th day of July 2025.

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4 By: /s/ Rona S. Li
5 Rona S. Li
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